

District Judge John H. Chun

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Yang Tian,

Plaintiff,

v.

Alejandro Mayorkas, Secretary of the U.S.  
Department of Homeland Security, et al.,

Defendants.

CASE NO. 2:22-cv-01259-JHC

STIPULATED MOTION TO STAY  
CASE

NOTE ON MOTION CALENDAR:  
November 22, 2022

Plaintiff Yang Tian and Defendants stipulate under Local Civil Rule 10(g) that this case should be stayed through March 10, 2023, to allow the parties to complete the administrative adjudication process that the mandamus Complaint seeks to compel. The Court has not set any deadlines that will be affected by this stipulated stay.

Plaintiff filed this action seeking to compel Defendants to adjudicate a pending form I-485 Application for Adjustment of Status. ECF No. 1, ¶ 15 and Prayer for Relief. On November 15, 2022, Defendant U.S. Citizenship and Immigration Services (USCIS) issued a Request for Evidence that requires Plaintiff to submit certain documents and information that USCIS needs to adjudicate Plaintiff's I-485 Application. The Request for Evidence gives Plaintiff until February 10, 2023, to provide the requested documents and information to USCIS. USCIS

1 presently expects that it will be able to adjudicate the I-485 Application within one month after  
2 the February 10, 2023, evidence submission deadline.


3 Accordingly, to avoid unnecessary litigation costs and use of judicial resources, Plaintiff  
4 and Defendants stipulate that this case shall be stayed through March 10, 2023. The stay shall  
5 expire automatically after March 10, 2023, unless extended further by court order. Any party  
6 may move to lift the stay before March 10, 2023, based on changed circumstances.

7 DATED this 22nd day of November 2022.

8 Respectfully submitted,


9 NICHOLAS W. BROWN  
10 United States Attorney

11 s/ Kyle A. Forsyth  
12 KYLE A. FORSYTH, WSBA # 34609  
13 Assistant United States Attorney  
14 United States Attorney's Office  
15 700 Stewart Street, Suite 5220  
16 Seattle, Washington 98101-1271  
17 Phone: 206-553-7970  
18 Fax: 206-553-4067  
19 Email: kyle.forsyth@usdoj.gov

20   
21 YANG TIAN, pro se Plaintiff

22 IT IS SO ORDERED.

23 Entered: November 22, 2022

24   
HON. JOHN H. CHUN  
United States District Court

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she/he is an employee in the Office of the United States Attorney for the Western District of Washington and is a person of such age and discretion as to be competent to serve papers;

It is further certified that on November 22, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participant(s):

-0-

I further certify that on November 22, 2022, I mailed the foregoing document by United States Postal Service, first class postage pre-paid, to the following non-CM/ECF participant(s), addressed as follows:

Yang Tian  
4750 Smithers Ave. S.  
Renton, WA 98055

Dated this 22nd day of November 2022.

s/ Crissy Leininger  
CRISSY LEININGER, Paralegal Specialist  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: (206) 553-7970  
Fax: (206) 553-4067  
E-mail: christine.leininger@usdoj.gov